

1 HEFFERNAN SEUBERT & FRENCH LLP
2 WILLIAM J. FRIMEL, Bar No. 160287
3 bill@hsflp.com
4 1075 Curtis Street
5 Menlo Park, CA 94025
6 Tel: 650.322.3048

7 DLA PIPER LLP (US)
8 ROY K. MCDONALD, Bar No. 193691
9 roy.mcdonald@dlapiper.com
10 555 Mission Street, Suite 2400
11 San Francisco, CA 94105-2933
12 Telephone: 415.836.2500
13 Facsimile: 415.836.2501

14 Attorneys for Defendant
15 LA JOLLA COVE INVESTORS, INC.

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 WORLD SURVEILLANCE GROUP
20 INC., a Delaware Corporation,

21 Plaintiff,

22 v.

23 LA JOLLA COVE INVESTORS, INC., a
24 California corporation, and DOES 1-30

25 Defendants.

26 CASE NO. 3:13-cv-03455 (WHO)

27 **LA JOLLA COVE INVESTORS, INC.'S
28 MOTION FOR ORDER AND [PROPOSED]
ORDER PERMITTING WITHDRAWAL
AND SUBSTITUTION OF COUNSEL**

29 Pursuant to Civil L.R. 7-11 and 11-5, defendant La Jolla Cove Investors, Inc. ("La Jolla
30 Cove") hereby moves the Court for an order permitting the withdrawal of its counsel of record,
31 Roy K. McDonald of DLA Piper LLP (US), and the appearance of substitute counsel, William J.
32 Frimel of Heffernan Seubert & French, on its behalf in this action. La Jolla Cove respectfully
33 submits that such substitution of counsel is in the interests of justice, and this motion is not being
34 made for purposes of delay or any other improper purpose.

35 La Jolla Cove, DLA Piper LLP (US), and Heffernan Seubert & French consent to such

1 withdrawal and substitution of counsel. Further, on January 9, 2013, counsel for plaintiff World
 2 Surveillance Group Inc., Brett Gibbs of Weisberg & Miller, was informed of the proposed
 3 substitution and confirmed that plaintiff does not oppose this motion.

4 Accordingly, La Jolla Cove respectfully requests that the Court enter an order permitting
 5 withdrawal and substitution of counsel for La Jolla Cove; that all necessary changes be made to
 6 the Court's records and ECF system for this case by removing Roy K. McDonald of DLA Piper
 7 LLP (US) as counsel of record and substituting in his place William J. Frimel of Heffernan
 8 Seubert & French; and that all future communications regarding this case be directed to the
 9 following:

10 HEFFERNAN SEUBERT & FRENCH LLP
 11 WILLIAM J. FRIMEL, Bar No. 160287
 12 bill@hsflp.com
 13 1075 Curtis Street
 Menlo Park, CA 94025
 Tel: 650.322.3048

14 Respectfully submitted,

16 Dated: January 13, 2014 DLA PIPER LLP (US)

17 By: */s/ Roy K. McDonald*
 18 ROY K. MCDONALD

19 Dated: January 13, 2014 HEFFERNAN SEUBERT & FRENCH

21 By: */s/ William J. Frimel*
 22 WILLIAM J. FRIMEL

23 Attorneys for Defendant
 24 LA JOLLA COVE INVESTORS, INC.

25
 26
 27
 28

1 Dated: January 13, 2014

2 LA JOLLA COVE INVESTORS, INC.

3 By: */s/ Steven M. Romanoff*
4 STEVEN M. ROMANOFF

5 I, Roy K. McDonald, am the ECF user whose ID and password are being used to file this
6 document. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that William Frimel and
7 Steven M. Romanoff have given their concurrence in the filing of this document.

8

9

10 **[PROPOSED] ORDER**

11 Having reviewed and considered defendant La Jolla Cove Investors, Inc.'s Motion for
12 Order Permitting Withdrawal and Substitution of Counsel, and good cause appearing, the Court
13 hereby orders that Roy K. McDonald of DLA Piper LLP (US) be permitted to withdraw as
14 counsel of record, and William J. Frimel of Heffernan Seubert & French be permitted to appear as
15 substitute counsel of record for La Jolla Cove Investors, Inc. The Court's records and ECF
16 system shall be updated to reflect these changes.

17 **IT IS SO ORDERED.**

18

19 Dated: _____, 2014

20

21 HONORABLE WILLIAM H. ORRICK
22 UNITED STATES DISTRICT JUDGE

23

24

25

26

27

28